

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ARROWOOD INDEMNITY COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:10-CV-02871-SO
)	
THE LUBRIZOL CORPORATION,)	JUDGE OLIVER
)	
Defendant.)	
)	
v.)	
)	
UNITED STATES FIRE INSURANCE)	
COMPANY)	
)	
Third Party Defendant)	

**PLAINTIFF ARROWOOD INDEMNITY COMPANY'S
MOTION FOR LEAVE TO FILE FIRST AMENDED ANSWER**

Pursuant to Federal Rule of Civil Procedure 15, Plaintiff/Counter-Defendant Arrowood Indemnity Company ("Arrowood") respectfully request this Court grant it leave to file its First Amended Answer to The Lubrizol Corporation's ("Lubrizol") Counterclaim. In support of this Motion, Arrowood states as follows:

1. Lubrizol filed its Counterclaim on February 10, 2011.
2. Arrowood timely filed its Answer to Lubrizol's Counterclaim and Motion to Dismiss on March 7, 2011.
3. Arrowood seeks leave to filed its First Amended Answer which adds two additional affirmative defenses arising from a settlement entered into by Lubrizol and The Orion Capital Companies, Arrowood's predecessor.
4. A copy of Arrowood's First Amended Answer is attached hereto as Exhibit A.

5. Under Rule 15, leave to amend should freely be given when justice so requires.
Fed. R. Civ. P. 15(a)(2).

6. Other than Rule 26(a)(1) disclosures, no discovery has yet been conducted in this matter and no party will be prejudiced by the amendment.

WHEREFORE, Plaintiff/Counter-Defendant Arrowood Indemnity Company requests this Court grant it leave to file its First Amended Answer to Lubrizol's Counterclaim and for such other and further relief as this Court deems just and proper.

Dated: July 12, 2011

Respectfully submitted,

By: /s/ Deborah C. Druley
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CERTIFICATE OF SERVICE

This is to certify that on July 12, 2011, Arrowood Indemnity Company's Motion for Leave to File First Amended Answer was filed electronically. Parties may access this filing through the Court's system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Deborah C. Druley
One of the Attorneys for Arrowood Indemnity Co.